

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**AMERICAN TAXI DISPATCH, INC.,  
an Illinois corporation,**

**Plaintiff,**

**v.**

**AMERICAN METRO TAXI  
& LIMO CO., an Illinois corporation,  
DAVID ZAYA, MORIS ZAYA,  
MIHAI POPESCU, ROMEO WARDA,  
FRANK THMUD, SEARG AKEBA,  
JAY ABHISHEK, ALI MARWIN,  
EDMON GABRLIA, DAVID EHEIN,  
NIKOLAY TANCHEU, THAER SELAMAN,  
BEMGEN MECO, GEORGE TANCHEU,  
YUSEF KITANA, AND THAER AWAD,**

**Defendants.**

**Case No.: 07 C 2602**

**Judge Amy J. St. Eve**

**MOTION FOR DEFAULT**

**NOW COMES** the Plaintiff, American Taxi Dispatch, Inc. (hereinafter "Plaintiff"), by and through its attorneys, The Thollander Law Firm, Ltd., and respectfully requests that this Court enter an Order of Default and Judgment thereupon against the Defendants, Mihai Popescu, Nikolay Tancheu, and George Tancheu as follows:

1. On April 13, 2009, Defendants Mihai Popescu, Nikolay Tancheu, and George Tancheu were served with a copy of the Amended Complaint and Summons. An answer or other pleading was required on or before May 4, 2009.

2. As of the date hereof, the Defendants have failed to answer or otherwise plead to the Amended Complaint.

3. Plaintiff moves for the entry of a Default Judgment. Attached hereto and incorporated by reference as Exhibit A is Plaintiff's proposed Order.

**WHEREFORE**, the Plaintiff, American Taxi Dispatch, Inc., respectfully requests that this Honorable Court enter an Order of Default against the Defendants Mihai Popescu, Nikolay Tancheu, and George Tancheu; and for such other and further relief as this Court deems just and equitable.

Respectfully submitted,

*American Taxi Dispatch, Inc.*

By: /s/ David C. Thollander  
One of its Attorneys

The Thollander Law Firm, Ltd.  
1048 Ogden Avenue  
Suite 200  
Downers Grove, Illinois 60515  
Phone: (630) 971 - 9195  
Facsimile: (630) 971 - 9240  
ARDC Number 6202012